Exhibit 39

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Saniya Suri June 25, 2024 (212) 336-2226

By Email

Meredith Nelson, Esq. Selendy Gay PLLC 1290 Avenue of the Americas New York, NY 10104

> Re: **Deficiencies in SaveOnSP's Document Productions and Custodians** Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC, Case No. 2:22-cv-02632 (JKS) (CLW)

Dear Meredith:

We write in response to your June 20, 2024 letter and in furtherance of our May 24, 2024 letter regarding SaveOnSP's document production and custodians.

In your letter, you provided a list of all SaveOnSP document custodians. Upon further investigation, JJHCS has identified various issues that require clarification.

First, you state that you have "produced documents from Jenna Ordonez under her maiden name, Jenna Quinn." June 20 Ltr. from M. Nelson to S. Suri App'x An.1. But SaveOnSP documents suggest that Jenna Quinn and Jenna Ordonez are in fact different individuals. See SOSP_0000144 (identifying Jenna Ordonez as an Account Manager, reporting to Jill Stearns and Jennifer Thompson, and Jenna Quinn as a Billing Specialist, reporting to Ingrid Vasquez); SOSP_0097967 (email sent to both Jenna Quinn and Jenna Ordonez, with sender stating "Hi Jenna and Jenna,"). Documents also suggest that Ms. Ordonez's maiden name was Jenna Elliott. See SOSP 0073005 (identifying Ms. Ordonez as "Jenna Ordonez provide clarity with regards to these individuals, including whether (1) Jenna Quinn has been added as a custodian; (2) Ms. Ordonez's previous email address, collected and searched using the parties' agreed-upon search terms; and (3) what search parameters SaveOnSP is using for Jenna Ordonez's custodial files, including her prior email address

Second, SaveOnSP has not shared what search parameters it is running for several custodians. Please provide the applicable search parameters for Brandon Bartz, Hailey Kramer, Sandy Mozrall, Jenna Quinn, Lauren Pacillo, Shannon Sommer, and Ingrid Vasquez.

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Third, in your June 20 letter, you agreed to add the <u>CPAQuestions@saveonsp.com</u> email address as a custodian and "to review and produce, relevant non-privileged documents captured by the parties' existing protocol." Please confirm the search terms that you plan to run over this email address and that SaveOnSP will search this email address for April 1, 2016 to November 7, 2023 time period.

Please provide a response by July 2, 2024.

Very truly yours,	
/s/ Saniya Suri	
Saniya Suri	